

ORIGINAL

FILED
DISTRICT COURT OF GUAM

AUG - 5 2005

MARY L.M. MORAN
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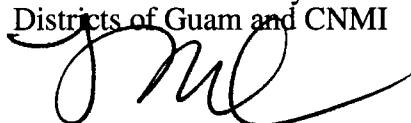
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7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF GUAM**

9 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 04-00048
10) Plaintiff,
11) vs.
12) GOVERNMENT'S MOTION
13) FOR A DOWNWARD DEPARTURE
) UNDER USSG § 5K1.1 AND
) 18 U.S.C. § 3553(e)
14 MARYJANE GONZAL QUINDO,)
15) Defendant.
)

16 Comes now the United States and moves, pursuant to USSG § 5K1.1 and 18 U.S.C.
17 § 3553(e), for a downward departure from the applicable total offense level to Level 25, which will
18 yield an advisory guideline range of 57 to 71 months with Criminal History Category I. The
19 government intends to recommend the minimum term under said range, and the reasons for such
20 recommendation are set forth in a memorandum, which the government is seeking to lodge under
21 seal for reasons of security.

22 RESPECTFULLY SUBMITTED this 5th day of August 2005.

23 LEONARDO M. RAPADAS
24 United States Attorney
25 Districts of Guam and CNMI
 
26 By:
 MARIVIC P. DAVID
27 Assistant U.S. Attorney
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